

**A Partners in Adoption, Inc.**  
i Hwy 9, Suite 103-351  
Alpharetta, Georgia 30004  
Phone (770) 844-2080  
Fax (770) 844-2075

NOV 19 2003

**Melissa Clause**  
**Executive Director**

November 6, 2003

U.S. Department of State, CA/OCS/PRI  
Adoption Regulations Docket Room  
SA-29  
2201 C. Street, N.W.  
Washington, DC 20520

Dear Sirs:

AAA Partners in Adoption, Inc. (PIA) has been a licensed child-placing agency since 1994. We have adoption programs in Russia & South Africa. For ten years, I have had liability insurance coverage with Marsh USA, Inc. My insurance premiums have doubled over the last two years. My insurance broker had much difficulty this year in even finding a broker to underwrite my coverage. I spoke with my broker, and she stated that Marsh USA, Inc. would not be able to provide the coverage that the Hague proposes. We are this year involved in a frivolous lawsuit because we have a sizeable liability policy. Extending insurance coverage, if even possible, to persons overseas would open our agency to all kinds of litigation. We would be forced to close our doors.

The provision about filing complaints with the accrediting bodies who, if they suspend our license, can only be reversed by taking them to the Federal District Court would discourage PIA from taking on adoption cases with extenuating circumstances and special needs adoption. We have taken pride in having a particular interest in special needs children and have never shirked from a difficult adoption.

The Hague is proposing that all social workers must have a MSW. I believe this is grossly unfair and shortsighted. I have a supervisor with 30+ years of experience in adoption services. Her degree is a Masters in Education. There should be some exception for experience in lieu of an MSW. I would have to fire the majority of my staff.

As to an agency carrying three months of operating expenses, I can understand, perhaps, a brand new agency having to prove a financial base. However, we have been in business for ten years, and we often operate on a cash flow basis.

We strongly hope you will reconsider the aforementioned provisions. In ratifying the Hague Treaty as proposed, you will create more barriers for the fine adoption agencies who champion the cause of million of orphans around the world.

Sincerely,

A handwritten signature in cursive script, appearing to read "Melissa Clause".

Melissa Clause  
Executive Director